

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

UNITED STATES OF AMERICA

V.

CRIMINAL NO. 4:18-CR-021-SA-JMV

EDWARD GIBSON

PROTECTIVE ORDER

The Government has informed the Court that it is in possession of records relating to juvenile neglect hearings and behavioral health treatment of the victims in this matter. In order to ensure the protection of sensitive information and to avoid the disclosure of confidential information to other individuals, the Court hereby enters the following order regulating disclosure of such material:

1. The Government is authorized to disclose the sensitive information described above;
2. The Government shall produce the documents as follows. The Government shall indicate the documents that include sensitive information as “Confidential,” which shall be governed by the following rules:
 - a. Counsel of record for defendant in this proceeding shall hold the Confidential portion of the Discovery in strictest confidence. Therefore, Defense counsel shall restrict access to this discovery, and shall disclose this discovery to his client, office staff, assisting attorneys, investigators, and to anticipated fact or expert witnesses only to the extent that defense counsel believes is necessary to assist in the defense of his client in this matter and in a manner that will prohibit the disclosure of this discovery to other persons not involved in the defense;

- b. Counsel of record for Defendant shall advise any person to whom the Confidential portion of the Discovery is disclosed that such information shall be held in strict confidence, and that further disclosure or dissemination is prohibited without defense counsel's express consent; and
- c. Counsel of record for defendant shall obtain a certification from each person to whom the Confidential portion of the Discovery is disclosed, in which the recipient, (a) acknowledges these restrictions as set forth in the Protective Order of the Court, and (b) agrees that they will not disclose or disseminate the information without express consent defense counsel. Counsel shall keep a copy of each certification to identify the individuals who received the Confidential portion of the Discovery and the date on which such information was first disclosed.
- d. Counsel of record agree that, upon conclusion of the above captioned case, copies of the Confidential portion of the Discovery disclosed to defense counsel pursuant to the terms of this order shall be destroyed or returned to the United States.
3. No party may refer in open court to evidence marked Confidential without first receiving permission from the Court. This includes references in argument, the questioning of a witness, or cross-examination.

It is SO ORDERED on this the 3rd day of May, 2018.

/s/ Sharion Aycock
UNITED STATES DISTRICT JUDGE